

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re MOODY'S CORPORATION
SECURITIES LITIGATION

No. 1:07-cv-8375-SWK
(ECF)

**LEAD PLAINTIFFS' REQUEST FOR DOCUMENTS
PURSUANT TO RULE 26, 34**

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DEFINITIONS & INSTRUCTIONS

The definitions and instructions are those set forth in the apposite Federal Rules of Civil Procedure, and Local Rule 26.3. In addition, the “SEC Report” means the Summary Report of Issues Identified in the Commission Staff’s Examinations of Select Credit Agencies dated July 2008. “Commission” means the United States Securities and Exchange Commission.

DOCUMENTS REQUESTED

1. All documents comprising or concerning Defendants’ internal records, deal files, internal audit reports, and email communications that are referred to at pp. 3-4 of the SEC Report and that Defendants made available to the Commission in connection with the review described in the SEC Report.
2. All documents comprising or concerning the on-site interviews referred to at page 3 of the SEC Report.

Dated: New York, New York
September 4, 2008

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By:

/s/ Ira M. Press

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